

Career and Technical Regulations

Topics and Feedback Summary

The chart below identifies the topics that were raised both in support of and opposition to the proposed Career and Technical Education regulations through the public comment process. The public comment process included four public hearings and additional written comments that were collected between October 6, 2011 and November 10, 2011. The formal comment period ends on November 29, 2011. There were a total of 68 speakers who provided public comment at the four public hearings. RIDE has received seven additional submissions of written comment as of November 10, 2011. The speakers and written commentary represent professional organizations including the RI Association of School Principals, RI Association of School Counselors, the English Language Learners Advisory Board, and SKILLS USA. Numerous CTE teachers and students represented nine of the career and technical centers with support from family members and community members as well as the Center directors. There was comment from two superintendents, board chairs, school committee members and others who shared their support and concerns about the proposed CTE regulations.

The chart below details the topics that were raised, a summary of comments provided on these topics, and responses to the concerns voiced in the public comment period. The RIDE recommendations include proposed revisions and responses to concerns. The chart is divided into four sections – frequently raised topics, the identification of the number of comments and identification of the role of those submitting comments, comments/feedback, and recommendations. The list includes comments or other concerns that were raised in a few instances, and other topics that were raised but do not impact the proposed certification regulations, such as general support for CTE and regulations and need for CTE PR campaign. Most of the points raised during public comment were similar to what RIDE heard from stakeholders during the engagement and development phase. RIDE presented draft regulations to numerous stakeholder groups (including: RISSA, RISEAC, RIASP, PCTA board, RIMLE, RISCA, etc.) and sought comments on the draft regulations through an online survey process. RIDE has considered seriously all of these views along with research and national and state practices in determining our recommendations.

The primary areas of concern include: career clusters in relation to student choice and access, lack of specificity in relation to the evaluation process, lack of support for maintaining the CTE centers as the sole delivery system for technical education, lack of funding, transportation regions as they pertain to student access and cost of transporting students to program of their choice, and innovation programs. There was significant support for CTE in general, support for the revision of the current (1990) regulations and a few comments commending the Regents intent to increase student access to CTE. Concomitant to the support were requests to revisit those areas listed above and a few people asked the Regents to consider postponing approval of the Regulations until further research and evaluation of possible impact on CTE centers.

Public comment sessions were held at the following dates and locations:

October 20, 2011	Providence Area Career and Technical Center	Regents Carolina Bernal and Patrick Guida
October 26, 2011	Coventry Career and Technical Center	Regents Colleen Callahan and Robert Carothers
November 1, 2011	Davies Technical Center	Regent Matt Santos
November 8, 2011	East Providence Career and Technical Center	Regents Karen Forbes, Patrick Guida, Matt Santos, Betsy Shimberg

The 68 speakers included:

15	Students	3	General Educators	11 of the speakers spoke multiple times for an additional 16 times, each unique comment was recorded but they were not counted as multiple speakers if their comments were repeated.
3	Family members	21	CTE Educators/teachers	
3	Community Members	15	Other	
8	Center Directors			

The entire hearing process was recorded and all of the written comments are available for review if needed for clarification of any of the summary points.

This summary is an attempt to capture as many of the concerns and comments as possible. The recommendations column describes the type of changes that are proposed as a result of the comments and further study of the issues. There are four categories for changes that will be listed under the recommendations column:

Material change – suggested revisions alter the intent or meaning of the identified section of the draft regulations.

No change – there are no changes made to the regulatory language.

Clarification – the regulatory language is changed to clarify the meaning but will not alter the meaning. Clarification will also include ensuring consistent use of terminology and meaning throughout the document.

Administrative response – there is no change to the draft language but rather additional documents or communications (such as guidance and FAQ documents) to clarify or explain the regulatory language will be provided.

The chart below summarizes the public comments made at the BOR public hearings for proposed CTE Regulations.

TOPIC	SOURCE OF COMMENTS	FEEDBACK	RECOMMENDATIONS
ACCESS (8)	(1) Student (1) Community Member (2) CTE Director (2) CTE Ed (2) Other	Support: <ul style="list-style-type: none"> Regulations increase access for students, provides them access to a program of their choice Concerns: <ul style="list-style-type: none"> Special education students will have limited access 	Access for special education students Section 5.0 Lines 361-363 Administrative Response
CLUSTERS (23)	(1) Student (3) CTE Director (11) CTE Ed (8) Other	Support: <ul style="list-style-type: none"> LEAs are better able to support students gaining access to cluster rather than specific program Concerns: <ul style="list-style-type: none"> Too many career areas in a single cluster Limits student choice Students end up with program they do not want, example: student wants to be in plumbing program can be put into electrical program since both are in construction cluster This will require the development of a “cluster” program – with pursuant issues of certificates for “cluster” instead of specific career area 	Clusters Section 5.1 Line 372-376 Material Change Change language from “cluster” to “program”
ADMISSIONS/ ENROLLMENT (5)	(4) CTE Ed (1) Other	Support: <ul style="list-style-type: none"> Admissions ensure that students are right for program, need good students for programs Concerns: <ul style="list-style-type: none"> Over enrollment – what is minimum expectation for admissions Need more details for continued enrollment expectations include motivation for CTE program Assessment included in admissions may limit access for special education students 	Section 5.0 Lines 361-363 & 366-367 Section 5.2 Lines 404-405 and 416 Clarification Administrative Response
REGIONS TRANSPORTATION REGIONS (11)	(2) CTE Director (5) CTE Ed (4) Other	Concerns: <ul style="list-style-type: none"> Limit student access if program is outside transportation region Decrease #s of students in centers since they can go to other areas outside their district Need more details One region has four centers Regions promote competition not camaraderie 	Section 5.1 Lines 386-390 Clarification Administrative Response

TOPIC	SOURCE OF COMMENTS	FEEDBACK	RECOMMENDATIONS
EXISTING REGIONS (2)	(1) CTE Director (1) CTE educator	<ul style="list-style-type: none"> Regional centers not mentioned in regulations Existing regions eliminated by new Regulations and transportation region 	No Change
FUNDING (13)	(2) CTE Director (1) Gen Ed (6) CTE Ed (4) Other	Concerns: <ul style="list-style-type: none"> RIDE will have control of funding How will funding be distributed for equity Local funding will not be enough to sustain quality programming Local funding is not available to Davies Expansion to include innovation programs will decrease funding to existing programs Not clear how categorical funds will be expended 	Section 7.0 Lines 500-550 Clarification Change Administrative Response
EVALUATION/ STANDARDS (15)	(6) CTE Director (6) CTE Ed (3) Other	Concerns: <ul style="list-style-type: none"> Innovation programs need flexible criteria, innovation programs need innovative assessments for programming and student outcomes Won't be equitable across traditional and innovation programs RIDE does not have the capacity to evaluate all programs Not enough detail in regulations about evaluation process, need schedule of when evaluations begin Need to grandfather in existing approved programs Programs should not be held to student outcomes immediately Sequencing of courses is limiting as some programs have more than 2 Students need time to get hours to fulfill requirement for credentialing Advisory board membership, who determines membership Absence of employment as outcome of CTE preparation programs 	Evaluation Section 4.0 Lines 284-353 and lines 301-303 Standards Addendum 1 Material Change Add language that clarifies the status of programs upon promulgation of regulations Clarification Administrative Response
Innovation (8)	(1) Family (3) CTE Director (3) CTE Ed (1) Other	Concerns: <ul style="list-style-type: none"> Resources will be spread too thinly across programs Won't be held to same standards Virtual is not same as hands-on activities Support: <ul style="list-style-type: none"> Will allow for programs like the MET 	Approval for innovation programs Section 2.1.3 Lines 218-220 & section 4.0 Standards for preparation programs Appendix 1 Virtual programming Section 2.0 Lines 98-100 Administrative Response

TOPIC	SOURCE OF COMMENTS	FEEDBACK	RECOMMENDATIONS
Centers/ Traditional Programs (15)	(4) CTE Director (7) CTE Ed (4) Other	Concerns: <ul style="list-style-type: none"> Millions spent on building and maintaining centers Centers meet building codes and zoning regulations Impact on facility transfer agreements Difficult to provide quality programs outside of centers, comprehensive schools will lack rigor of centers Outside programs will siphon off money from centers Facilities and staff in existing centers and programs of study are industry certified 	Approval for traditional programs Section 4.0 Standards for preparation programs Appendix 1 Administrative Response
GENERAL SUPPORT FOR REGULATIONS (5)	(1) Student (2) CTE Director (3) Other	Support: <ul style="list-style-type: none"> Revisions are good for CTE, increased access and opportunities for students Increased innovation is good for CTE Overall intent of regulations is good RISCA and member counselors support the regulations and revisions Focus on priority areas 	NA
GENERAL SUPPORT FOR CTE (23)	(18) Student (2) Family (3) other	Support: <ul style="list-style-type: none"> Good preparation for college Run business because of experience at CTE Internship and mentors strong support for success and necessary for success in school CTE builds a community in the programs CTE provides hands-on activities Builds leadership qualities RISCA strong support for CTE as viable option for students 	NA

TOPIC	SOURCE OF COMMENTS	FEEDBACK	RECOMMENDATIONS
MET (20)	(10) Students (2) Parent (3) Director (5) Other	Support: <ul style="list-style-type: none"> Met provides strong work skills training, mentor, and internship Promotes creativity and entrepreneurship Supports diverse student population Success linked to strong mentorship program	NA
CTE COMMUNICATION AND PR (2)	(1) CTE Ed (1) Other	Concerns: <ul style="list-style-type: none"> Necessary to promote CTE as viable career for many students State needs a state CTE PR campaign 	Lines 434-439 & 441-445 Administrative Response